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Attorneys for Defendants Jesus Chavez, Jr.,  
Jesus Chavez, Sr., Pedro Chavez and Jorge Garcia

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

HYPHY MUSIC INC., a California  
corporation; DOMINGO TORRES, an  
individual; and ALFONSO VARGAS,  
an individual,

Plaintiffs,

v.

YELLOWCAKE, INC., a California  
corporation; COLONIZE MEDIA,  
INC., a California corporation, KEVIN  
BERGER, an individual, JOSE DAVID  
HERNANDEZ, an individual; JESUS  
CHAVEZ, SR, an individual; JESUS  
CHAVEZ, JR, an individual: PEDRO  
CHAVEZ, an individual and JORGE  
GARCIA. an individual.

Defendants.

**Case No.: 1:23-cv-00683-ADA-EPG**

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS JESUS  
CHAVEZ, JR., JESUS CHAVEZ,  
SR., PEDRO CHAVEZ AND JORGE  
GARCIA TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

Complaint Filed: May 3, 2023

1 TO THE HONORABLE COURT:

2 Plaintiffs Hyphy Music Inc., Domingo Torres and Alfonso Vargas (collectively,  
3 “Plaintiffs”) and defendants Jesus Chavez, Jr., Jesus Chavez, Sr., Pedro Chavez  
4 and Jorge Garcia (collectively, “Defendants”), by and through their respective  
5 counsel, hereby stipulate and agree as follows:

6 WHEREAS, on May 3, 2023, Plaintiffs filed their Complaint;

7 WHEREAS Defendants, except Jesus Chavez, Sr., were served with the  
8 Complaint, Summons, and related documents on July 9, 2023;

9 WHEREAS the response to the Complaint is currently due by Defendants, except  
10 Jesus Chavez, Sr., on July 31, 2023;

11 WHEREAS counsel for Defendants agreed to accept service for Jesus Chavez, Sr.  
12 and Jesus Chavez, Sr. was served on July 28, 2023;

13 WHEREAS, Defendants have recently retained counsel and more time is necessary  
14 to assess the case before a response is filed;

15 WHEREAS this is the first extension requested by Defendants;

16 NOW THEREFORE, it is hereby stipulated and agreed by and between Plaintiffs  
17 and Defendants that the deadline for Defendants to respond to Plaintiffs’ complaint  
18 is extended to August 31, 2023.

19 IN WITNESS WHEREOF, the undersigned have made and entered into this  
20 Stipulation as of the date set forth below.

21 DATED: July 31, 2023

COLEMAN & HOROWITT, LLP

22 By: /s/ Sherrie M. Flynn

23 Sherrie M. Flynn

24 Attorneys for Plaintiffs Hyphy Music, Inc.,  
25 Domingo Torres and Alfonso Vargas  
26  
27  
28

1 DATED: July 31, 2023

LAW OFFICES OF LARRY ZERNER

2 By: /s/Larry Zerner

3 Larry Zerner

4 Attorney for Defendants Jesus Chavez, Jr.,  
5 Jesus Chavez, Sr., Pedro Chavez and Jorge  
6 Garcia

7 **ATTESTATION REGARDING SIGNATURES**

8 Counsel for Defendants hereby attests by signature below that concurrence in the  
9 filing of this document was obtained from counsel for Plaintiff.

10 DATED: July 31, 2023

LAW OFFICES OF LARRY ZERNER

11 By: /s/Larry Zerner

12 Larry Zerner

13 Attorney for Defendants Jesus Chavez, Jr.,  
14 Jesus Chavez, Sr., Pedro Chavez and Jorge  
15 Garcia